
THE MARKS LAW FIRM, P.C.

October 23, 2024

FILED VIA ECF

Hon. Peggy Kuo
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East, Courtroom 11C South
Brooklyn, NY 11201

RE: Lesaldo Shalto v. John's Panini Grill Inc., et al.

Index: 1:24-cv-06583- PK

Dear Judge Kuo,

Pursuant to Section IV of Your Honor's Individual Part Rules and Practices ("Extensions of Time"), Plaintiff, on behalf of both Defendants, respectfully requests a thirty (30) day extension of Defendant, John's Panini Grill Inc.'s ("John's") deadline to respond to Plaintiff's Complaint from **October 14, 2024** to **November 14, 2024** and Defendant, 38-01 Vernon Blvd, LLC's ("38-01 Vernon") deadline to respond to Plaintiff's Complaint from **November 6, 2024** to **December 6, 2024** [Dkt. 6 and 7].

The reason for this request is that on October 22, 2024, our office spoke with "Rosa" and "Antonio Moshonas" (purported agents of 38-01 Vernon) for the first time, who informed us that 38-01 Vernon was aware of this action, their insurance company disclaimed coverage on October 22, 2024, and that they were in the process of retaining counsel to represent them in this matter. Furthermore, "Rosa" and "Antonio" informed us that this matter had also been discussed with the tenant and confirmed that the tenant was aware of this action and was also seeking counsel but required additional time to do so.

In light of the above, both Rosa and Antonio requested additional time for both Defendants to file their Answers to give them time to continue investigating this matter and retain counsel in this action. Plaintiff consents to this request, subject to this Court's approval. If we do not hear back from Defendants or they fail to appear in this action, our office will move for default against them no later than **December 6, 2024**. This is the first request of its kind and is being made on behalf of both Defendants.

We thank you and the Court for your time and consideration.

Respectfully Submitted,

The Marks Law Firm, P.C.

By: 

Bradly G. Marks